

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
Greenbelt Division**

In re:

Nahid Ahmadpour

Debtor

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Case No.: 18-11248 WIL
Chapter 7

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OBJECTION OF TRUSTEE TO DEBTOR'S AMENDED EXEMPTIONS

Laura J. Margulies, Chapter 7 Interim Trustee appointed in the above-referenced case, hereby objects, pursuant to Rule 4003(b) of the Federal Rules of Bankruptcy Procedure and 4003-1 of the Local Rules, to the exemptions claimed by the above referenced Debtor, and in support of her objection, states as follows:

1. Debtor filed a Chapter 7 on January 30, 2018, and Laura J. Margulies was appointed Trustee.
2. Debtor filed original Schedule C on January 30, 2018, Docket No. 1, and filed an Amended Schedule C on March 9, 2018, Docket No. 43.
3. Among the assets of the estate is the Debtor's real property located at 4045 41st Street North, McLean, Virginia 22101 (the "Property"). The Debtor has claimed the entire equity in the Property as exempt under "11 U.S.C. Section 522(b)(3)(B); William v. Peyton 104 F.3rd 688." The Debtor was originally the sole owner of the Property and subsequently added her husband to the title to the Property and currently owns it with her husband. Prior to the filing of this case, one of the Debtor's creditors, Nationwide Registry & Security Ltd (NRS"), filed suit in the Virginia state court seeking to void the transfer of the Property from the Debtor to the Debtor

and her husband. NRS has filed a motion for relief from stay to allow it to proceed with the state court suit, and the Chapter 7 Trustee has consented to the lifting of the stay. If the stay is lifted and if the court in the state court litigation voids the transfer, the Debtor will again be the sole owner of the Property and should not be able to claim the tenants by the entirety exemption.

WHEREFORE, the Trustee hereby requests that this Court enter an Order sustaining her objection to the Debtor's claimed exemption in the Property, and granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

Date: March 16, 2018

/s/ Laura J. Margulies
Laura J. Margulies, 06585, Chapter 7 Trustee
6205 Executive Blvd.
Rockville, MD 20852
(301) 816-1600
trustee@law-margulies.com

CERTIFICATE OF SERVICE

I hereby certify that on March 16, 2018, a copy of the foregoing, and Notice of Objection was sent by ecf or by first class mail postage prepaid to:

Nahid Ahmadpour
14316 Kings Crossing Blvd
Boys, MD 20841

Kevin D. Judd, Esq.
bkadmin@juddlawfirm.com

Office of the US Trustee
6305 Ivy Lane, Ste. 600
Greenbelt, MD 20770

/s/ Laura J. Margulies
Laura J. Margulies